

1 Kathleen P. March, Esq., (CA SBN 80366)  
2 **THE BANKRUPTCY LAW FIRM, PC**  
3 10524 W. Pico Blvd, Suite 212, LA, CA 90064  
4 Phone: 310-559-9224; Fax: 310-559-9133  
5 Email: kmarch@BKYLAWFIRM.com  
6 *Counsel of Record for Han Trinh*

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UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA—SANTA ANA DIV.

In re  
THE  
LITIGATION  
PRACTICE  
GROUP, P.C.,  
Debtor.

Bankruptcy Case No. 8:23-bk-10571-SC  
Chapter 11

**UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC [GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE CLAIMS; DECLARATION OF KATHLEEN P. MARCH, ESQ. ATTACHING EXHIBITS**

Status conference on all Motions for administrative claims is set for:

Date: February 29, 2024

Time: 11:00 a.m.

Place: Courtroom of Bankruptcy Judge Scott Clarkson, by Zoom or in person at:  
411 West Fourth Street, Courtroom 5C  
Santa Ana, CA 92701-4593

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**UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC [GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE CLAIMS; KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS**

1       Administrative claimants Greyson Law Center PC (Greyson's Motion for  
2 Allowance and Payment of Administrative Claim is dkt.676), Han Trinh (Han's  
3 Motion for Allowance and Payment of Administrative Claim is dkt.674) and Phoung  
4 (aka Jayde) Trinh (Jayde's Motion for Allowance and Payment of Administrative  
5 Claim is dkt.675) submit their herein **UNILATERAL STATUS REPORT** for the  
6 2/29/24 at 11am Status Conference on Motions for Allowance and Payment of  
7 Administrative Claims.

10      By this UNILATERAL STATUS REPORT, Greyson Law Center PC, Han  
11 Trinh and Phoung (aka Jayde) Trinh inform the Court that attorney Kathleen P.  
12 March, Esq of The Bankruptcy Law Firm, PC, which is counsel of record for  
13 Greyson, Han and Jayde, on their Motions for Allowance and Payment of  
14 Administrative Claims, has already sent Trustee Marshack's law firm, Marshack  
15 Hays, 3 emails responding to all questions which the Marshack Hays law firm, by  
16 attorney Alina Mamlyuk, Esq, has asked in Mamlyuk's 3 emails to March, regarding  
17 the 3 Motions for administrative claims.

18      Mamlyuk's 3 emails, and March's 3 Response emails, are attached to  
19 Declaration of Kathleen P. March, Esq. to this Unilateral Status Report, to show this  
20 Court that:

21      1.     March's 3 emails have answered all questions regarding Greyson's,  
22 Han's and Jayde's Motions for allowance of payment of administrative claim, asked  
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25 **UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC**  
26 **[GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE**  
27 **CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM**  
28 **MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE**  
29 **CLAIMS; KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS**

by Mamlyuk's emails;

2. March's firm has already (via dropbox) sent Mamlyuk the 2,480 Greyson to Phoenix invoices, pursuant to the Greyson-Phoenix Contract, for Phoenix to pay Greyson \$2,000 per lawsuit, for Greyson to supply Greyson attorneys to appear for Phoenix, to defend Phoenix consumer debtor clients in lawsuits where those debtor clients are being sued for allegedly unpaid consumer debts;

3. Because this court set all the administrative claim motions for status conference, so that the parties could **exchange discovery informally**, March's firm, in March's 3 emails, request Marshack Hays to provide specified discovery to March's firm; and

4. Because there are no valid grounds on which to oppose the Greyson, Han and Jayde Motions for Allowance and Payment of Administrative Claims, and because March's 3 RESPONSE emails to Marshack Hays firm show there are no valid grounds on which to oppose those 3 Motions, March's 3 emails request Trustee Marshack to file a pleading with this Court, stating that Trustee Marshack does not oppose the Greyson, Han or Jayde Motions for allowance and payment of administrative claims.

Dated: February 19, 2024 THE BANKRUPTCY LAW FIRM, PC

/s/ Kathleen P. March  
By: Kathleen P. March, Esq.

*Attorneys for Greyson Law Center, PC, Han Trinh, and Phoung (aka Jayde) Trinh, on their Respective Motions for Allowance and Payment of Administrative Claims*

**UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC  
[GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE  
CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM  
MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE  
CLAIMS: KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS**

1                   **DECLARATION OF KATHLEEN P. MARCH**

2                   I, KATHLEEN P. MARCH, declare:

3

4                   1. I am an attorney in good standing, admitted to practice law in California  
5 and New York. I am admitted to USDistrict Court, and Bankruptcy Court, CD CA,  
6 among other Courts. I own and run The Bankruptcy Law Firm, PC, counsel to  
7 Greyson Law Center PC, Han Trinh, and Phoung (aka Jayde) Trinh, on their  
8 Respective Motions for Allowance and Payment of Administrative Claims, all timely  
9 filed. The three Motions, respectively are dkt.676 (Greyson), dkt. 674 (Han) and dkt.  
10  
11 675 (Jayde).

12

13                   2. My firm received three emails from attorney Alina Mamlyuk of the  
14 Marshack Hays law firm (counsel to Trustee Marshack regarding administrative claims  
15 motions), asking various questions about the 3 administrative claims motions.

16

17                   3. Attached hereto as **Exhibits A, B and C**, are my firm's 3 Response  
18 emails, which also include, with each Response, the Mamlyuk email I am responding  
19 to.

20

21                   4. My 3 attached 3 emails answered all questions regarding Greyson's,  
22 Han's and Jayde's Motions for allowance of payment of administrative claim, asked in  
23 Mamlyuk's 3 emails to my firm.

24

25                   5. As my 3 emails show, my firm already (via dropbox) sent Mamlyuk the  
26 2,480 Greyson to Phoenix invoices, pursuant to the Greyson-Phoenix Contract, for

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28                   **UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC**  
[GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE  
CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM  
MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE  
CLAIMS; KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS

Phoenix to pay Greyson \$2,000 per lawsuit, for Greyson to supply Greyson attorneys to appear for Phoenix, to defend Phoenix consumer debtor clients in lawsuits where those debtor clients are being sued for allegedly unpaid consumer debts;

6. Because this court set all the administrative claim motions for status conference, so that the parties could exchange discovery informally, my 3 emails request Marshack Hays to provide specified discovery to my firm; and

7. Because there are no valid grounds on which to oppose the Greyson, Han and Jayde Motions for Allowance and Payment of Administrative Claims, and because March's 3 RESPONSE emails to Marshack Hays firm show there are no valid grounds on which to oppose those 3 Motions, March's 3 emails request Trustee Marshack to file a pleading with this Court, stating that Trustee Marshack does not oppose the Greyson, Han or Jayde Motions for allowance and payment of administrative claims.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration is executed at Los Angeles, California on February 19, 2024.

/s/ Kathleen P. March

KATHLEEN P. MARCH

**UNILATERAL STATUS REPORT** OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC  
[GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE  
CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM  
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CLAIMS; KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS

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**UNILATERAL STATUS REPORT OF ADMINISTRATIVE CLAIMANTS GREYSON LAW CENTER PC**  
[GREYSON ADMINISTRATIVE CLAIM MOTION IS DKT.676], HAN TRINH [HAN ADMINISTRATIVE  
CLAIM MOTION IS DKT.674] AND PHOUNG (AKA JAYDE) TRINH [JAYDE ADMINISTRATIVE CLAIM  
MOTION IS DKT.675] FOR THE 2/29/24 AT 11:00AM STATUS CONFERENCE ON ADMINISTRATIVE  
CLAIMS; KATHLEEN P. MARCH DECLARATION ATTACHING EXHIBITS

K. P. March

RESPONSE

**From:** K. P. March <kmarch@bkylawfirm.com>  
**Sent:** Friday, February 16, 2024 5:24 PM  
**To:** 'Alina Mamlyuk'  
**Cc:** 'Ed Hays (EHays@MarshackHays.com)'; 'Layla Buchanan'  
**Subject:** To Alina Mamlyuk Esq of Marshack Hays firm, cc attys Hays and Buchanan, from KPMarch, Bky LF: See below Greyson Law Center PC response to your 2/14/24 at 11:06am email asking questions re Greyson [dkt.676] admin claim Motion

RE, GREYSON  
LAW CENTER,  
PC

021624

To Alina Mamlyuk esq, of Marshack Hays firm, with cc to Marshhack Hays attorneys Ed Hays and Layla Buchanan (attys for Trustee Marshack on admin claims)

From KPMarch, Esq., Bky LF, attys for Greyson Law Center PC, which additionally represent Han Trinh and Jayde Trinh, on Han and Jayde's respective motions for allowance and payment of administrative claims

Attorneys Mamlyuk, Hays and Buchanan:

This email responds to attorney Mamlyuk's email of 2/14/24 at 11:06am, which asks some questions about the Motion [dkt.676] for allowance and payment of administrative claim of our law firm's client, Greyson Law Center, PC ("Greyson" hereinafter).

Greyson's [dkt.676] Motion has two parts: Mamlyuk asks questions about Greyson's \$5,134,000 administrative claim, but asks no questions about Greyson's \$300,633 administrative claim. I will address the \$300,633 portion of Greyson's administrative claim motion, and then will address your questions about the \$5,134,000 portion of Greyson's administrative claim motion.

My firm assumes you ask no questions about Greyson's \$300,633 administrative claim, because there is no basis on which to dispute the \$300,633 of damage caused to Greyson by the improper conduct of Trustee's Special counsel (Dinsmore & Sholl, aka Celentino firm). Greyson seeks allowance and payment to Greyson, by the LPG bankruptcy estate, of \$300,633, for the 22 high value Greyson clients, which Greyson lost, of the 48 Greyson Client files that Celentino firm (Dismore & Sholl) improperly seized at Greyson's office on 6/2/23, due to the negligence –and intentionally wrong conduct--of Trustee's attorneys Dinsmore & Sholl (aka the Celentino firm/their field agents) seizing/converting 48 Greyson client files from Greyson's office, on 6/2/23, and delaying returning those files to Greyson for one month. And that is not all Celentino's firm seized: Celentino firm seized all Greyson's

The whole lockout and seizure was wrongful: Celentino firm only obtained the [dkt.13] 5/26/23 Lockout and Preliminary Injunction Order against Greyson, based on the false allegation that Greyson was an alter ego of debtor LPG (an allegation Celentino admitted was false, at the 6/12/24 Bankruptcy Court hearing [Transcript pp.33:22-34:5]). After Celentino firm wrongfully seized the 48 Greyson client files at Greyson's office on 6/2/23, Celentino firm delayed for a month, returning Greyson's 48 client files to Greyson, despite Celentino firm having told Judge Clarkson, at the 6/12/24 hearing, that Celentino firm would return the 48 files to Greyson [Transcript p.262:4-15 ("you have the trustee's promise that we will get the data files to them [Greyson] on those 48 clients." ; also see p.36:14-20].

The result was that Greyson lost the high paying 22 Greyson clients, out of the 48 total Greyson clients, to Phoenix Law ("Phoenix" hereinafter) (which Celentino firm had taken over running as an alter ego of LPG), because during whole month before Celentino firm returned Greyson's 48 client files to Greyson, Greyson could not communicate with those 48 clients, as Celentino firm had not only taken the 48 paper client files, but, on 6/2/23, had additionally seized Greyson's computers (never returned), had seized and locked Greyson out of Greyson's whole Microsoft [M365 suite] account (access never restored to present), had seized and locked Greyson out of Greyson's internet domain/website (access never restored to present), and had seized and locked Greyson out of all of Greyson's emails (access never restored to present). Because of all these (and additional) seizures, Greyson was prevented from communicating with any of the 48 Greyson clients for the month that Celentino firm kept Greyson's 48 client files.

Celentino firm obviously gave Greyson's 48 client files to LPG alter ego Phoenix (which Celentino firm took over running on 6/2/24) to examine, and to take from Greyson those of the 48 clients that Phoenix wanted to take, because Phoenix took the 22 high value clients from Greyson, and only the 26 low value clients were left when Celentino firm returned the 48 paper client files to Greyson. The one month delay in returning Greyson's files was negligent/intentionally violative of Greyson's rights.

The Declaration to Greyson's dkt.676 Motion, of Greyson head administrator Han Trinh, is uncontroverted in attesting that Greyson would have made \$300,633 from the 22 high value files which Phoenix took away from Greyson, during the one month that Celentino withheld returning Greyson's 48 Greyson client files from Greyson. which files Celentino obviously provided to Phoenix to sort through, so Phoenix could contract with those of the 48 Greyson clients Phoenix wanted, during the one month when Celentino firm prevented Greyson from being able to communicate with those 48 Greyson clients.

That is not lawful competition. That is unfair competition, perpetrated by Celentino's firm, as Trustee Marshack's special counsel. The LPG bankruptcy estate is liable to pay \$300,633 to Greyson, to compensate Greyson for that \$300,633 of damage Celentino firm caused to Greyson. The LPG bankruptcy estate is further liable to pay Greyson for that \$300,633 of damage, because the Bankruptcy Court determined that Phoenix is an alter ego of LPG, so Phoenix taking Greyson's 22 high paying clients—because, inter alia--Celentino firm prevented Greyson from being able to communicate with Greyson's clients for a month, and provided those 48 files to Phoenix, is the same as LPG taking Greyson's 22 high paying clients.

As regards your questions about the \$5,134,00 part of Greyson's [dkt.676] Motion, Greyson has put in dropbox, all Greyson's invoices to Phoenix, for work done pursuant to the \$2,000 per law suit contract between Greyson and Phoenix, which Greyson has been able to access, at present.

Greyson's invoices bill Phoenix the \$2,000 per case--which Phoenix contracted to pay Greyson--for Greyson to supply Greyson attorneys, to appear in state court suits, located all over the US, on behalf of Phoenix, to defend Phoenix consumer debtor clients who were being sued in those state court suits, for allegedly unpaid consumer debts.

Here is the dropbox link:

<https://www.dropbox.com/scl/fo/3dx48eubxkl214ixe4gj4/h?rlkey=xydk04b460w6y86plxbq4e84i&dl=0>

so you can access and view Greyson's invoices billing Phoenix for the \$2,000 per case, per contract. These invoices state the information your 2/14/24 email says you seek.

There are 2,480 of \$2000 Greyson to Phoenix invoices in drop box, which total \$4,960,000 ( $2,480 \times \$2,00 = \$4,960,000$ ).

However, the \$4,960,000 figure is low, because Greyson cannot access additional \$2,000 invoices that are in Greyson's computers/data/docs which the Celentino firm/its field agents seized at Greyson's office on 6/2/23, and which Celentino firm has still has not returned to Greyson, to present.

Because Greyson's computers/documents/data were (wrongfully) seized on 6/2/24, Greyson had to estimate, in Greyson's dkt.676 administrative claim Motion, the total dollar amount of Greyson to Phoenix \$2,000 per lawsuit invoices.

Greyson's dkt.676 Motion estimates that figure at \$5,134,000. But that figure may well turn out to be low, if Greyson gets back Greyson's computers, data, and documents that Celentino

If the \$5,134,000 figure is low, then Greyson will amend the \$5,134,000 figure, in Greyson's dkt.676 Motion, to increase it to the total number of Greyson to Phoenix invoices x \$2,000 per invoice.

Greyson's dkt.260 Motion for return of Greyson's computers, data and documents seized 2/6/23 at Greyson's office, by Celentino firm/his field agents, is at present set for hearing on 3/27/24 at 1:30pm. It would speed things up, if Trustee Marshack would instruct his special counsel, Dinsmore & Sholl (aka the Celentino firm) to return Greyson's computers, data and documents immediately. The only reason [dkt.13] the 5/26/23 Lockout and preliminary injunction order, was issued as to Greyson, was due to the false allegation, made by the Celentino firm, that Greyson was an alter ego of LPG, when Greyson was never an alter ego of LPG. To the contrary, Greyson always was and is a competitor of firms such as LPG, and of such firms as Morning Law Group, which bought LPG's business in the July 2023 bankruptcy court sale of LPG's business.

Celentino admitted, at the hearing held 6/12/23, that Greyson was not an alter ego of LPG.

Our firm suggests that Trustee Marshack step in and instruct the Celentino firm to return Greyson's computers, data and documents seized 2/6/23 at Greyson's office by Celentino firm/his field agents.

The longer Greyson is deprived of Greyson's computers, data and documents seized on 6/2/23, the greater the damage is to Greyson, from Greyson being unlawfully deprived of those items, lack of which seriously damages Greyson's ability to compete with Morning Law Group and to compete with other law firms in the same business as Greyson and Morning Law. It is a wonder that Greyson has survived this long, without its computers, data and documents. Greyson is entitled to amend its administrative claim, to claim for damage to Greyson, from Celentino firm failing to return Greyson's computers/data/documents to Greyson, and the longer Greyson is unlawfully hindered in competing with Morning Law Group and other law firms in the same business, by Celentino firm withholding Greyson's computers/data/documents from Greyson, the larger that damage to Greyson will be.

As regards your question as to whether there is any duplication of Greyson's [dkt.676] Motion for allowance and payment of administrative claims, with the Motions for allowance and payment of administrative claims filed by certain attorneys. There is NO duplication. On the contrary, none of those attorneys which filed administrative claim motions are part Greyson's administrative claim to be paid the \$2,000 per lawsuit, which Phoenix owes Greyson, pursuant to the \$2,000 per lawsuit contract between Greyson and Phoenix. Those attorneys'

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Main Document Page 11 of 36  
administrative claim Motions are not based on work those attorneys did pursuant to the  
\$2,000 per case contract between Greyson and Phoenix. Those attorneys seek to be paid for  
their post-petition work for LPG, for representing LPG clients, during the post-petition period  
to up to when LPG's assets /business was sold to Morning Law Group in the bankruptcy court  
sale in July 2023, which closed on 08/04/2023.

Judge Clarkson continued all the Motions for allowance and payment of administrative claims,  
so Trustee and the claimants could exchange discovery. Greyson hereby requests that Trustee  
immediately return to Greyson, as discovery, the following:

1. all Greyson invoices to Phoenix, that are in the documents and data which Trustee's  
special counsel Dinsmore & Sholl (aka the Celentino firm and its field agents) seized at  
Greyson's office in the 6/2/23 Lockout of Greyson from Greyson's office.
2. The fully signed written contract between Greyson Law Center PC, and Phoenix Law  
Center--for Phoenix to pay Greyson \$2,000 per lawsuit, for Greyson attorneys to appear  
for Greyson, to defend Phoenix clients in lawsuits in which Phoenix consumer debtor  
clients were being sued for alleged unpaid consumer debts--which fully signed contract  
was seized from Han Trinh's locked office at Greyson's office in the 6/2/23 Lockout.
3. All unsigned copies and drafts of the Contract described in 2 supra.

In addition, Greyson requests that Trustee promptly supply to Greyson, as discovery:

4. All emails, texts, and other documents of LPG's alter ego, Phoenix Law--which since  
6/2/23 has been controlled by Trustee Marshack's attorneys--which refer to, describe, or  
in any way evidence the \$2,000 per case contract between Greyson and Phoenix.
5. All emails, texts, documents, or writings of any kind, which reflect, refer to, or reference,  
how Phoenix came to take/obtain/or contract with the 22 high paying clients, of  
Greyson's 48 total clients, which client files for those 48 Greyson clients were seized by  
Celentino/his field agents, from Greyson's office, in the 6/2/23 lockout of Greyson from  
Greyson's office.
6. All emails, texts, documents, or writings of any kind, which reflect, refer to or evidence  
the Celentino firm/its field agents allowing Phoenix to have access to Greyson's 48 client  
files, which the Celentino firm/its field agents seized from Greyson's office in the 6/2/23  
lockout of Greyson from Greyson's office.

Please REPLY to confirm receipt, and please in your reply, tell my firm how soon my firm can  
expect to receive items 1-6. Thank you.

KPMarch

Kathleen P. March, Esq.  
The Bankruptcy Law Firm, PC  
10524 W. Pico Blvd, Suite 212  
Los Angeles, CA 90064  
Phone: 310-559-9224  
Fax: 310-559-9133  
E-mail: [kmarch@BKYLAWFIRM.com](mailto:kmarch@BKYLAWFIRM.com)  
Website: [www.BKYLAWFIRM.com](http://www.BKYLAWFIRM.com)  
*"Have a former bankruptcy judge for your personal bankruptcy attorney"*

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**From:** Alina Mamlyuk <[amamlyuk@marshackhays.com](mailto:amamlyuk@marshackhays.com)>  
**Sent:** Wednesday, February 14, 2024 11:06 AM  
**To:** kmarch@BKYLAWFIRM.com  
**Cc:** Ed Hays <[EHays@MarshackHays.com](mailto:EHays@MarshackHays.com)>; Layla Buchanan <[L Buchanan@marshackhays.com](mailto:L Buchanan@marshackhays.com)>  
**Subject:** RE: LPG Dk. No. 676; Greyson Law Center, P.C.'s Administrative Claim

Good morning, Ms. March—

I emailed you yesterday regarding LPG Dk. No. 674, Han Trinh's administrative claim and emailed you today regarding LPG Dk. No. 675, Phuong (aka Jayde) Trinh's administrative claim. In investigating and verifying the three administrative claims in which you are counsel to the three claimants (Dk. Nos. 674, 675, 676 filed in In re: Litigation Practice Group, P.C., Case No. 8:23-bk-10571-SC), I would prefer to keep them distinct and separate from each other for clarity. I will keep the communication threads separate, although they may be asking for similar or even identical documentation.

Your client, Greyson Law Center, P.C. ("Greyson"), filed an administrative claim as Dk. No. 676 ("Greyson Admin Claim" / "Motion") in the amount of \$5,134,000.00 and I am following up with you regarding some questions we have and documents we need to begin verifying the claim.

Please provide the breakdown of the names of attorneys in Han Trinh's declaration (pgs. 35-36) who she alleges worked post-petition for Phoenix Law Group, "pursuant to Greyson's contract with Phoenix Law Group." Likewise, please provide a list of the "lawsuits" that Han Trinh alleges these attorneys worked on which form the basis for Greyson's claim. Greyson's allegation in the claim is that its attorneys were handling 2,567 lawsuits in the post-petition admin period. Please provide a list of case numbers for these lawsuits so that we can verify that work was done on each of these during the admin claim period.

As you may already be aware, several attorneys also filed administrative claim motions based on their employment with Greyson, so as this point it is critical to identify any possible overlap between admin claim motions and verify the amounts allowable under §503(b). This is why the list of names of attorneys (other than just names of states where they worked) will be critical as well as list of case numbers.

Looking forward to working together and getting some clarity in resolving this claim.

Thank you,

Alina Mamlyuk  
(949) 333-7777

K. P. March

RESPONSE

**From:** K. P. March <kmarch@bkylawfirm.com>  
**Sent:** Wednesday, February 14, 2024 12:15 PM  
**To:** 'Alina Mamlyuk'  
**Cc:** 'Ed Hays'; 'Layla Buchanan'  
**Subject:** Alina Mamlyuk Esq of MarshackHays firm, from KPMarch, Esq., Bky LF for Han Trinh:  
Please read below RESPONSE to your 2/12/24 at 7:46pm email. Please REPLY to confirm  
receipt. Please email my firm the 4 items of discovery my firm requests. Thx  
**Attachments:** Exhibit B to Han Decl items that Han owned that disappeared 110823 resaved  
021324.pdf; paychex paystubs for Han and Jayde showing accruing vacation hours.pdf

RE. HAN  
TRINH w/EX'S  
ASR

021424

To Alina Mamlyuk, Esq of MarshackHays firm, counsel for Trustee Marshack, cc to MarshackHays attys Ed Hays and Layla Buchanan

From KPMarch, Esq. of The Bankruptcy Law Firm, PC, counsel for Han Trinh on Han's Motion for allowance and payment of administrative claim [dkt.674], counsel for Phuong (aka Jayde) Trinh on Jayde's Motion for allowance and payment of administrative claim [dkt.675] and counsel for Greyson Law Center PC on Greyson's Motion [dkt.676]:

Atty Mamlyuk:

This email responds to your 2/12/24 at 7:46pm email regarding the Motion for allowance and payment of administrative claim [dkt.674] filed by our law firm, for our firm's client Han Trinh.

I see on the California State Bar website that you are an attorney, CA Bar #284154. Why are you so coy about your status, in your email? Are you employed by Trustee Marshack's law firm, MarshackHays? Reply and tell my firm please. I find it is helpful to be clear about whom my firm is dealing with.

Your email is in error in saying that Han's [dkt.674] Motion does not provide any evidence for how Han's administrative claim is calculated. Han's [dkt.674] Motion, and Han's Declaration thereto, are extremely clear as to how the \$136,280.56 salary that LPG owes Han, for Han's essential 11 weeks of post-petition work for LPG, is calculated.

But let me recap that calculation for you: See ¶8 of Han's Declaration, and see Paychex paystub that is Exhibit A to Han's Declaration. The Paychex paystub states that Han was being paid gross earnings of \$11,538.47 per 2 week pay period (see top right box on Exhibit A). That is gross pay of \$5,769.23 per week, as ¶8 of Han's Declaration states. Han attests Han did 11 weeks of essential work for LPG, post-petition, from 3/20/23 to 6/2/23 (¶7 Han Decl). \$5,769.23 per week x 11 weeks = \$63,461.54 salary that LPG owes Han for that postpetition work, which is an administrative claim per 11 USC §503(b)(1)(A)(i).

In addition, as Han's administrative claim Motion explains, and as Han's Declaration (¶22 explains) she is entitled, per CA Labor Code §203(a), to be paid penalties for late Pay totaling \$34,615.38 in late pay penalties.

In addition, as Han's administrative claim Motion explains, and as Han's Declaration explains, Han is entitled, per CA Labor Code § 227.3, to be paid for 264.88 hours of vacation time Han had accrued, but had not taken, as of 6/2/23. That vacation pay totals **\$38,203.64**, and is calculated correctly in Han's Dkt.674 claim, and in Han's Declaration (¶23).

You ask for evidence (in addition to Han's Declaration, and Jayde Trinh's Declaration) that Han and Jayde were accruing vacation pay while employed at LPG.

Han has searched, and now been able to locate two earlier Paychex pay stubs, one for each of Han and Jayde, which I am attaching as **Exhibit A** hereto, and which show that Han and Jayde were each accruing vacation pay while employed at LPG, at the rate of 6.16 hours of vacation time, for each 2 week pay period. I believe that is the statutory rate of accrual, for a business in Tustin, Ca, where LPG was located. Han's Declaration (¶23) attests that Han and Jayde were each accruing vacation hours at the rate of 6.16 hours of vacation time, for each 2 week pay period.. The 2 paychex paystubs that I am attaching as **Exhibit A**, show this. My firm's understanding is that all LPG W-2 employees accrued vacation hours at this same 6.16 hours of vacation time, for each 2 week pay period.

I note that Paychex was LPG's payroll processing company, and therefore, that Trustee Marshack can ask Paychex to supply Trustee Marshack with the Paychex paystubs, for Han and Jayde Trinh, for the several years each was employed by LPG. Please do so, and please send my firm copies of all those paystubs. Thx in advance.

Han's [dkt.674] Motion, p. 12, adds up the \$63,461.54 + \$34,615.38 +\$38,203.64 = **\$136,280.56 postpetition salary, late pay penalties and payment for accrued vacation not taken.**

In addition, the LPG owes Han **\$14,433.56** for items that disappeared from Han's locked office at Greyson's office, after Trustee Marshack's attorneys (Dinsmore & Sholl aka Celentino firm and its field agents, on 6/2/23, locked Greyson out of its office. I apologize, but the list of items Han had paid for personally, which "disappeared" from Han's locked office, **Exhibit B**, does not seem to be attached to the Dkt.674 Motion, so I am attaching it now.

As regards to your email requesting my firm to provide you/MarshackHays, with a copy of Han's employment contract with LPG, Han does not have a copy, but **LPG has a copy of Han's employment contract, fully signed by Han and LPG LPG also has a copy of Phuong (aka Jayde) Trinh's employment contract, fully signed by Jayde and LPG.**

Han and LPG signed that written contract when Han was first hired by LPG, and each time Han got a raise thereafter, Han signed a sheet for the LPG HR department, verifying the specific raise. Ditto for Jayde Trinh.

Judge Clarkson continued the hearing on all the administrative claim motions so that the parties could exchange discovery. Therefore, please email my firm the following:

1. LPG's copy of Han's employment contract, signed by Han and by LPG. Also, please email my firm the series of sheets that Han signed for LPG's HR department, each time Han received a raise from LPG, verifying the amount of Han's new salary.
2. Please also please email my firm LPG's copy of Phuong (aka "Jayde" Trinh's employment contract, signed by Jayde and by LPG. Like Han, Jayde signed a sheet for

3. LPG kept an employee file on each LPG employee. Please email my firm the full employee file which LPG kept on Han, and the full employee file which LPG kept on Jayde.
4. All paychex paystubs for Han and Jayde Trinh, for all the years they were employed by LPG; and
5. LPG's W-2 forms for 2023 year for each of Han and Jayde Trinh.

Thanks in advance for emailing my firm 1, 2,3, 4 and 5.

At the time that Han Trinh, and Jayde Trinh, performed the 11 weeks of post-petition work for LPG, they were the only LPG employees who were doing the work they did for LPG, and who could continue doing that work for LPG. Their work was essential (as Han's Declaration ¶11 and 12 explains; see also Jayde's Declaration), because Han and Jayde were the only LPG employees administering LPG's 28,000 active litigation files. Those 28,000 active litigation files could not be managed, without Han and Jayde's work.

As regards your question about why Han's salary was increased over the years, LPG increased Han's salary, as Han's duties at LPG increased. Ditto with Jayde. Han's salary was incrementally increased to \$300,000 per year (as shown on Paychex paystub that is Exhibit A to Han's [dkt.674] administrative claim motion. The increase of Han's salary to \$300,000 per year was because by then, Han and Jayde, together, were administering the whole LPG attorney network.

Han was not paid more than Jayde, because a part of Jayde's compensation was that LPG contracted to repay Jayde's student loans from law school, before those loans came due, which LPG did pay. When LPG's repaying Jayde's student loans from law school is taken into account, Jayde was paid more than Han.

However, as the Paychex paystubs that are Exhibit A to Han's administrative motion claim, and are Exhibit A to Jayde's administrative motion claim, show clearly Han and Jayde's W-2 salaries, and as those are issued by LPG's payroll processing company, Paychex, there is no legal basis for Trustee Marshack, or you, or MarshackHays to object to (aka second guess) those salary amounts.

Please REPLY to confirm receipt.

Please email my firm 1, 2, 3, 4 and 5.

I trust this email answers your questions, and that MarshackHays will now file a short pleading with the Bankruptcy Court, stating that MarshackHays has examined Han and Jayde Trinh's Motions for allowance and payment of administrative claims, and agrees those should be granted as filed. My firm requests MarshackHays to promptly do so, because there is no valid reason to oppose Han's or Jayde's administrative claim motions. Please REPLY to confirm MarshackHays will now do that, promptly. Thank you in advance.

KPMarch

Kathleen P. March, Esq.  
The Bankruptcy Law Firm, PC  
10524 W. Pico Blvd, Suite 212

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**From:** Alina Mamlyuk <[amamlyuk@marshackhays.com](mailto:amamlyuk@marshackhays.com)>  
**Sent:** Monday, February 12, 2024 7:46 PM  
**To:** kmarch@BKYLAWFIRM.com  
**Cc:** Ed Hays <[EHays@MarshackHays.com](mailto:EHays@MarshackHays.com)>; Layla Buchanan <[L Buchanan@marshackhays.com](mailto:L Buchanan@marshackhays.com)>  
**Subject:** RE: LPG Dk. No. 674; Han Trinh's Administrative Claim

Good evening, Ms. March—

My name is Alina Mamlyuk, I am handling the administrative claim motions filed in In re: Litigation Practice Group, P.C., Case No. 8:23-bk-10571-SC on behalf of the Trustee, Richard Marshack. Your client, Han Trinh ("Han," to differentiate from Jayde Trinh), filed an administrative claim as Dk. No. 674 ("Han Admin Claim" / "Motion") in the amount of \$136,280.56 and I am following up with you regarding some questions we have and documents we need to begin verifying the claim.

Other than a copy of a paystub for a single check #13033, the Motion did not provide any evidence for your calculation of Han's admin claim. Can you please provide a copy of an employment agreement that states Han's duties, her salary, her vacation vesting schedule and the basis for her nearly ten-fold salary increase from \$17.31/hr to \$300,000/yr in the span of two and a half years employment at LPG? It appears that your other client, Jayde Trinh, who is a CA licensed attorney and who alleges to have performed nearly identical duties as Han, was making 20% less than Han and I am hoping you can provide any evidence that would explain such a drastic difference in the employment agreement/reviews/pay bump documentation. This large check was cut to Han on the eve of LPG's filing its bankruptcy petition. Han's declaration attached to Dk. No. 822, states that "Jayde and I work for a living. We are young and are not financially well off," which appears to indicate that the sudden and extreme pay bump was recent. For how many periods did Han receive paychecks comparable to check #13033 attached to Han's admin claim motion?

Likewise, there is no evidence outside of Han's declaration regarding the vested vacation portion of Han's claim (\$38,203.64)—the paycheck stub has no vacation time indicated at all. Please forward any employment agreement that states how 264.88 hours were vested.

Looking forward to working together and getting some clarity in resolving this claim.

Thank you,

Alina Mamlyuk  
949-333-7777

LITIGATION PRACTICE GROUP PC  
17542 17th St Ste 100  
Tustin CA 92780

1607-7926  
LOC:LPG Law CA  
EE ID: 1031 DD

Payroll by Paychex, Inc.  
NON-NEGOTIABLE

HAN TRINH

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS				
Han Trinh		BASIS OF DESCRIPTION				
Soc Sec #: XXX-XX-XXXX Employee ID: 1031		HRS/UNITS				
Home Department: 1 LPG CA		RATE THIS PERIOD (\$)				
Pay Period: 01/30/23 to 02/12/23		YTD HOURS				
Check Date: 02/17/23 Check #: 12689		YTD (\$)				
NET PAY ALLOCATIONS		PAY				
DESCRIPTION THIS PERIOD (\$)		Salary				
Check Amount 0.00		11538.47				
Chkg 860 5297.85		M24.0000				
NET PAY 5297.85		24.0000				
21491.38		Total Hours				
		Gross Earnings				
		11538.47				
		Total Hrs Worked				
		Dir Dep Reimb				
		REIMB & OTHER PAYMENTS				
		300.00				
		300.00				
WITHHOLDINGS		DESCRIPTION				
		FILING STATUS				
		THIS PERIOD (\$)				
		YTD (\$)				
		Social Security				
		690.62				
		Medicare				
		161.51				
		Fed Income Tax SMS				
		1841.42				
		CA Income Tax SMI2 1 0				
		739.71				
		2958.84				
		CA Disability				
		100.25				
		401.00				
TIME OFF (Based on Policy Year)		TOTAL				
		3533.51				
		14134.06				
DEDUCTION		DESCRIPTION				
		THIS PERIOD (\$)				
		YTD (\$)				
		401k EE Pretax				
		2307.69				
		Medical Pre-tax				
		399.42				
		TOTAL				
		2707.11				
		10828.44				
NET PAY		THIS PERIOD (\$)				
		5297.85				
		21491.38				

Payroll by Paychex, Inc.

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LITIGATION PRACTICE GROUP PC  
17542 17th St Ste 100  
Tustin CA 92780

1607-7926  
LOC:LPG Law CA  
EE ID: 1032 DD

Payrolls by Paychex, Inc.

Payrolls by Paychex, Inc.

PHUONG TRINH  
[REDACTED]

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS			
Phuong Trinh [REDACTED]		BASIS OF DESCRIPTION			
Soc Sec #: xxx-xx-xxxx Employee ID: 1032		HRS/UNITS			
Home Department: 1 LPG CA		RATE THIS PERIOD (\$)			
Pay Period: 01/30/23 to 02/12/23		YTD HOURS			
Check Date: 02/17/23 Check #: 12690		YTD (\$)			
NET PAY ALLOCATIONS		WITHOLDINGS			
DESCRIPTION	THIS PERIOD (\$)	YTD (\$)	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)
Check Amount	0.00	-12448.55	Social Security		591.19
Chqg 643	6224.28	37845.68	Medicare		138.26
<b>NET PAY</b>	<b>6224.28</b>	<b>25397.11</b>	Fed Income Tax	SMS	1826.69
TIME OFF (Based on Policy Year)		CA Income Tax SMI2 1 0 No			
DESCRIPTION	BEG BAL	CURR ACCT	CURR DEDUCT	AVAL BAL	TOTAL
Sick	40.00 hrs	0.00 hrs	0.00 hrs	40.00 hrs	2556.14
DESCRIPTION	BEG BAL	CURR ACCT	CURR DEDUCT	AVAL BAL	TOTAL
Vacation	206.35 hrs	6.16 hrs	0.00 hrs	212.51 hrs	834.97
DEDUCTION		DESCRIPTION			
401k EE Pretax		THIS PERIOD (\$)			
Medical Pre-tax		YTD (\$)			
PostTx EE health					
NET PAY		THIS PERIOD (\$)			
		6224.28			
		YTD (\$)			
		25397.11			

Payrolls by Paychex, Inc.

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amazon.com

Final Details for Order # 113-1730046-4248266  
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Order Placed: September 23, 2021  
Amazon.com order number: 113-1730046-4248266  
Order Total: \$233.82

Shipped on September 24, 2021	
<b>Items Ordered</b> 1 of: HP 24mh FHD Monitor - Computer Monitor with 23.8-Inch IPS Display (1080p) - Built-In Speakers and VESA Mounting - Height/Tilt Adjustment for Ergonomic Viewing - HDMI and DisplayPort - (1D0JAA#ABA) Sold by: DailyKiosk (3M Recycled) (Seller: usdca) Supplied by: Other Condition: New	Price \$217.00
<b>Shipping Address:</b> Hau Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> Standard Shipping	
<b>Payment information</b>	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132	
<b>Billing address</b> Hau Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Credit Card transactions</b>	
Visa ending in 3132: September 24, 2021:\$233.82	

To view the status of your order, return to [Order Summary](#).

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Final Details for Order # 114-4617124-3925061  
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Order Placed: July 10, 2021  
Amazon.com order number: 114-4617124-3925061  
Order Total: \$0.00

Shipped on July 10, 2021	
<b>Items Ordered</b> 1 of: Daily Ritmo Small Lined Pastel Sticky Notes   Turquoise, Peach, Lilac, Grey Checklist  3 in x 3 in, 50 Sheets/Pad, 4 Pads Sold by: Daily Ritmo (Seller: usdca) Supplied by: Other Condition: New	Price \$9.99
<b>Shipping Address:</b> Hau Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	
Shipped on July 10, 2021	
<b>Items Ordered</b> 1 of: Adufox Memory Foam Keyboard Wrist Rest/Gaming Mouse Wrist Rest, Ergonomic Design for Office, Home Office, Laptop, Desktop Computer, Gaming Keyboard (Black) Sold by: Adufox (Seller: usdca) Supplied by: Other Condition: New	Price \$20.99
<b>Shipping Address:</b> Hau Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	
<b>Payment information</b>	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132 Gift Card	
Item(s) Subtotal: \$65.96 Shipping & Handling: \$0.00 ----- Grand Total: \$65.96	

Condition: New
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States
<b>Shipping Speed:</b> FREE Prime Delivery

Shipped on July 10, 2021

Items Ordered	Price
1 of: Aelfox Memory Foam Keyboard Wrist Rest & Gaming Mouse Wrist Rest, Ergonomic Design for Office, Home Office, Laptop, Desktop Computer, Gaming Keyboard (Black)	\$20.99
Sold by: Amazon.com LLC Shipped by: Other	
Condition: New	
1 of: DAILY RITMO Large Lined Sticky Notes, Pastel Collection, 4 in x 6 in, 50 Sheets/Pad, 4 Pads	\$12.99
Sold by: Daily Ritmo (dailyritmo) Shipped by: Other	
Condition: New	
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	

Payment information

Payment Method:	Item(s) Subtotal: \$65.96
Amazon.com Visa Signature   Last digits: 3132	Shipping & Handling: \$0.00
Gift Card	-----
Billing address	Total before tax: \$65.96
Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	Estimated tax to be collected: \$5.11
	Gift Card Amount: -\$7.07
	Grand Total: \$60.00

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Final Details for Order #114-6315537-6276225

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Order Placed: June 16, 2021  
Amazon.com order number: 114-6315537-6276225  
Order Total: \$355.41

Shipped on June 17, 2021

Items Ordered	Price
1 of: HOW Ignition 2.0 Mid-Back Adjustable Lumbar Work Mesh Computer Chair for Office Desk (Black Fabric)	\$313.86
Sold by: Amazon.com Services LLC Shipped by: Other	
Condition: New	
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	

Shipped on June 17, 2021

Items Ordered	Price
1 of: Knodel Dual Mat, Dual-Sided Office Desk Pad, Waterproof Desk Mat for Desktop, Desk Pads & Blotters, Desk Pad Protector for Office and Home (35.4" x 17", Pink)	\$15.99
Sold by: Knodel (knodel)	
Shipped by: Other	
Condition: New	
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	

Payment information

Payment Method:	Item(s) Subtotal: \$329.85
Visa   Last digits: 8977	Shipping & Handling: \$0.00
Allianz address	-----

<b>Items Ordered:</b>	1 of: HOM Ignition 2.0 Mid-Back Adjustable Lumbar Work Mesh Computer Chair for Office Desk (Black Fabric)	
Sold by:	HOM.com Services LLC	
Shipped by:	Other	
Condition:	New	
<b>Shipping Address:</b>	Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b>	FREE Prime Delivery	
<b>Shipped on June 17, 2021</b>		
<b>Items Ordered:</b>	<b>HOM Ignition 2.0 Mid-Back Adjustable Lumbar Work Mesh Computer Chair for Office Desk (Black Fabric)</b> Sold by: HOM.com Services LLC Shipped by: Other Condition: New	
<b>Shipping Address:</b>	Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b>	FREE Prime Delivery	
<b>Payment information</b>		
<b>Payment Method:</b>	Visa   Last digits: 8977	
<b>Billing address:</b>	Sonthe Huang 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Credit Card transactions</b>	Item(s) Subtotal: \$329.85 Shipping & Handling: \$0.00 Total before tax: \$329.85 Estimated tax to be collected: \$25.56 <b>Grand Total: \$355.41</b>	
	Visa ending in 8977: June 17, 2021: \$17.23 Visa ending in 8977: June 17, 2021: \$338.18	

— 1 —

**Order Placed:** June 2, 2021  
**Amazon.com order number:** 114-9848888-1833847  
**Order Total:** \$172.78

<b>Shipped on June 2, 2021</b>	
<b>Items Ordered</b>	
1 of: Office Chair, High Back Premium PU Leather Office Computer Swivel Desk Task Chair, Ergonomic Executive Chair with Lumbar Padding and Flip-up Armrests (61AB33WH)	
Sent by: KVMR2018 (Seller: 22218)	
Shipped by: Other	
Condition: New	
<b>Shipping Address:</b> San Francisco 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> Standard Shipping	
<b>Payment information</b>	
<p><b>Payment Method:</b> Visa   Last digits: 8977</p> <p><b>Billing address:</b> Jonathan Hoang 2128 W CHERRY DR ORANGE, CA 92868-1927 United States</p>	
<p>Item(s) Subtotal: \$164.99 Shipping &amp; Handling: \$0.00             Total before tax: \$164.99            Estimated tax to be collected: \$12.79  <b>Grand Total: \$177.78</b></p>	
<b>Credit Card transactions</b>	

Condition: New 1 of: Rose Gold Desk Organizer for Women Cute Home Office Accessories & Supplies Decor, Girly Desktop Stationary Essentials Organization Set, Mesh Caddy Storage 5 Compartments + 1 Mini Sliding drawer Sold by: Three Way Co4 (seller_reviews)   Product question? Ask seller Supplied by: FBA, Other	\$19.99
Condition: New 1 of: Astrofoam Memory Foam Keyboard Wrist Rest&Gaming Mouse Wrist Rest, Ergonomic Design for Office, Home Office, Laptop, Desktop Computer, Gaming Keyboard (Black) Sold by: Astrofoam (seller_reviews)   Product question? Ask seller Supplied by: Other	\$20.99
Condition: New 1 of: KIDMEN Rosegold Desk Accessory Kit,Set of Stapler, Staple Remover,1000pcs Staples,Tape Dispenser,Big Diamond Ballpoint Pen and 10pcs Binder Clips Sold by: KIDMEN (seller_reviews)   Product question? Ask seller Supplied by: Other	\$19.99
Condition: New 1 of: Knodel Dual-Sided Desk Mat, Desk Pad, Upgrade Sewing PU Leather Desk Blotter Protector, Mouse Pad, Writing Mat for Office and Home (35.4" x 17", Dark Blue) Sold by: Knodel (seller_reviews)   Product question? Ask seller Supplied by: Other	\$14.99
Condition: New 1 of: Logitech G502 HERO High Performance Wired Gaming Mouse, HERO 25K Sensor, 25,600 DPI, RGB, Adjustable Weights, 11 Programmable Buttons, On-Board Memory, PC / Mac Sold by: Logitech (seller_reviews)   Product question? Ask seller Supplied by: Other	\$46.99
Condition: New 5 of: WALI Tempered Glass Monitor Riser Desktop Stand Height Adjustable Table Top for Flat Screen LCD LED TV, Laptop, Notebook, Display (GTT01) Sold by: WALI Electric (seller_reviews)   Product question? Ask seller Supplied by: Other	\$16.99
Condition: New <b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> Amazon Day Delivery	

Payment information	
Payment Method: Visa   Last digits: 8977	Item(s) Subtotal: \$303.89
Billing address: Jonathan Hoang 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	Shipping & Handling: \$0.00 Total before tax: \$303.89 Estimated tax to be collected: \$23.57 Grand Total: \$327.46
Credit Card transactions	Visa ending in 8977: May 25, 2021:\$327.46

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Final Details for Order #114-2555577-0804219  
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Order Placed: May 24, 2021  
 Amazon.com order number: 114-2555577-0804219  
 Order Total: \$1,142.90

Shipped on May 25, 2021	
<b>Items Ordered</b> 2 off: Knodel Dual-Sided Desk Mat, Desk Pad, Upgrade Sewing PU Leather Desk Blotter Protector, Mouse Pad, Writing Mat for Office and Home (35.4" x 17", Pink) Sold by: Knodel (seller_reviews)   Product question? Ask seller Supplied by: Other	Price \$14.99
Condition: New 2 off: Cloudf Nine C800 Ergonomic Mechanical Keyboard for PC - (Cherry MX Blue Switches) - RGB Light Up LED Backlit with USB - Ergo Split Key Board with Macro Sold by: Cloudf Nine Eng (seller_reviews)   Product question? Ask seller Supplied by: Other	\$219.00
Condition: New <b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	Partial
<b>Shipping Speed:</b> FREE Prime Delivery	

Shipped on May 25, 2021	
<b>Items Ordered</b> 2 off: Jelly Comb KS6S Ergonomic Wireless Keyboard and Mouse, 2.4GHz Full-Sized Ergonomic Keyboard with Palm Rest and Wireless Mouse for PC, Computer, Laptops, Windows XP/V7/8/10-Black Sold by: DENO CA1 (seller_reviews)   Product question? Ask seller Supplied by: Other	Price \$24.99
Condition: New 1 off: MultiKey NE060607 Light Luxury Fashion Paper Clips, Rose Gold Edition, In Round Paper Clip Holder With Magnetic Lid, 28 mm, 100 Piece Per Box Sold by: DUCRAY TECH WORLD (seller_reviews)   Product question? Ask seller Supplied by: Other	\$8.99
Condition: New 1 off: Wireless Keyboard Mouse, Jelly Comb 2.4GHz Ultra Slim Full Size Rechargeable Wireless Keyboard and Mouse Combo for Windows, Laptop, Notebook, PC, Desktop, Computer (White and Gold) Sold by: DENO Direct (seller_reviews)   Product question? Ask seller Supplied by: Other	\$39.99
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR	

<p><b>Shipping Speed:</b> FREE Prime Delivery</p>	
<b>Shipped on May 26, 2021</b>	
<p><b>Items Ordered</b> 1 of: HP 27-Inch FHD Monitor with Built-in Audio (27fw, White) Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p><b>Price</b> \$242.24</p>
<p><b>Shipping Address:</b> Hai Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States</p>	
<p><b>Shipping Speed:</b> FREE Prime Delivery</p>	
<b>Shipped on May 26, 2021</b>	
<p><b>Items Ordered</b> 1 of: HP 27-Inch FHD Monitor with Built-in Audio (27fw, White) Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p><b>Price</b> \$242.24</p>
<p><b>Shipping Address:</b> Hai Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States</p>	
<p><b>Shipping Speed:</b> FREE Prime Delivery</p>	
<b>Payment information</b>	
<p><b>Payment Method:</b> Visa   Last digits: 8977</p>	<p>Item(s) Subtotal: \$1,051.42 Shipping &amp; Handling: \$0.00 Total before tax: \$1,051.42 Estimated Tax to be collected: \$81.48 CA Electronic Waste Recycling Fee \$10.00 ..... <b>Grand Total:</b> \$1,142.90</p>
<p>amazon.com</p>	
<p>Final Details for Order #114-8314698-8364259 <a href="#">Print this page</a> for your records.</p>	
<p>Order Placed: April 14, 2022 Amazon.com order number: 114-8314698-8364259 Order Total: \$259.95</p>	
<b>Shipped on April 15, 2022</b>	
<p><b>Items Ordered</b> 1 of: Screen &amp; Glass Screen Protector Compatible for iPhone 13 Pro Max [6.7 Inch] Display 2021 with 2 Pack Tempered Glass Camera Lens Protector [SH Hardness]-HD Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p><b>Price</b> \$8.98</p>
<p>1 of: Klein Tools 32581 4-in-1 Electronics Screwdriver Set with Precision Machines Bits: 2 Slotted, 2 Phillips, and Cushion Grip Handles, 4-Piece Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p>\$9.97</p>
<p>1 of: Huionix Magnetic Shockproof Designed for iPhone 13 Pro Max Case with MagSafe[Military Grade Drop Protection] Slim Fit Translucent Matte Back with Soft Texture Edge Case for iPhone 13 Pro Max 6.7" Sold by: Huionix Direct (seller) (seller) Shipped by: Other Condition: New</p>	<p>\$23.39</p>
<p><b>Shipping Address:</b> Hai Trinh 17542 17TH ST STE 105 TUSTIN, CA 92780-7934 United States</p>	
<p><b>Shipping Speed:</b> FREE Prime Delivery</p>	
<b>Shipped on April 17, 2022</b>	
<p><b>Items Ordered</b> 1 of: Precision Screwdriver Set with Case, All-in-One Multi-Function Repair Tool Kit Includes 39 Bits for Apple Products Klein Tools 32717 Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p><b>Price</b> \$29.97</p>
<p>1 of: CRAFTSMAN Phillips, 6-Piece Mini Set with Pouch (CMHT81716) Sold by: Amazon.com Services LLC Shipped by: Other Condition: New</p>	<p>\$22.00</p>
<p>2 of: Mounting Dream UL Listed TV Mount for Most 37-70 inch TV, Universal Tilt TV Wall Mount Fit 16", 18", 24" Stud with Loading 132 lbs &amp; Max VESA 600x400mm, Low Profile Flat Wall Mount Bracket MD2268-LK Sold by: Mounting Dream (seller) (seller) Shipped by: Other Condition: New</p>	<p>\$29.99</p>

1 of: Precision Screwdriver Set with Case, All-in-One Multi-Function Repair Tool Kit Includes 39 Bits for Apple Products Klein Tools 32717	\$29.99
Sold by: Amazon.com Services LLC Shipped by: Other	
Condition: New	
1 of: CRAFTSMAN Pliers, 6-Piece Mini Set with Pouch (CMH71716)	\$22.00
Sold by: Amazon.com Services LLC Shipped by: Other	
Condition: New	
2 of: Mounting Dream UL Listed TV Mount for Most 37-70 Inch TV, Universal Tilt TV Wall Mount Fit 16", 18", 24" Stud with Loading 132 lbs & Max VESA 600x400mm, Low Profile Flat Wall Mount Bracket MD2268-LK	\$29.99
Sold by: Mounting Dream (fudacim2023)   Product question? Ask Seller Shipped by: Other	
Condition: New	
1 of: Magnetic Wireless Car Charger for MagSafe Mount iPhone 13/13 Pro/ 13 Pro Max/ 13 Mini/iPhone 12/12 Pro/ 12 Pro Max/12 Mini, Qi 15 W Car Charging, Car Dashboard and Air Vent Car Phone Holder	\$33.99
Sold by: 21M48 Seller (edificm2023) Shipped by: Other	
Condition: New	
1 of: 2 in 1 Magnetic Wireless Charger Stand - Max 15W Fast Wireless Charging Station Compatible with Mag-Safe Charger, iPhone 13/13 Pro/13 Pro Max/13/13 Mini/AirPods 2/3/Pro, with QC 3.0 Adapter	\$35.99
Sold by: 21M48 Seller (edificm2023) Shipped by: Other	
Condition: New	
1 of: ZUB488 Magnetic Wireless Charger Pad Compatible with MagSafe case, Only Supports iPhone Series 12/13/ Mini Pro Pro max and Wireless-Charger AirPods Series [With USB-C 20W PD Adapter and Storage Case]	\$24.99
Sold by: 21M48 Seller (edificm2023) Shipped by: Other	
Condition: New	
<b>Shipping Address:</b> Han Trinh 17542 17TH ST STE 105 TUSTIN, CA 92706-7934 United States	
<b>Shipping Speed:</b> FREE Prime Delivery	

Payment Information	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132	Item(s) Subtotal: \$249.26 Shipping & Handling: \$0.00 Your Coupon Savings: \$0.00 Total before tax: \$241.26 Estimated tax to be collected: \$18.69 <b>Grand Total: \$259.95</b>
<b>Billing address</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	Visa ending in 3132: April 18, 2022: Visa ending in 3132: April 15, 2022:
<b>Credit Card transactions</b>	

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<b>Final Details for Order #113-0341077-5751479</b> Print this page for your records.	
<b>Order Placed:</b> January 17, 2022 <b>Amazon.com order number:</b> 113-0341077-5751479 <b>Order Total:</b> \$34.47	
<b>Shipped on January 22, 2022</b>	
<b>Items Ordered</b> 1 of: SHC Round Mesh Stainless Steel Wastebasket Trash Can Recycling Bin for Home, Office, Bathroom, Bedroom & Kitchen, 3.5 Gallon / 12L, 11" Height x 10" Diameter Garbage Can (Rose Gold) Sold by: Superdome Shelves / FRANKS-HAUS-ROSE-12L Shipped by: Other Condition: New	
<b>Shipping Address:</b> Anne Perez 17542 17th St. Suite 105 Tustin, CA 92790 United States	
<b>Shipping Speed:</b> Two-Day Shipping	
Payment Information	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132	
<b>Billing address</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Credit Card transactions</b>	

To view the status of your order, return to [Order Summary](#).

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Final Details for Order #114-2390867-3745051  
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Order Placed: January 12, 2023  
Amazon.com order number: 114-2390867-3745051  
Order Total: \$432.47

Shipped on January 12, 2022	
<b>Items Ordered</b>	
1 of: Soft Close, Rectangular Trash Can Sl with Anti - Bag Slip Liner and Lid, Use as Mini Garbage Basket, Slim Dust Bin, or Decor in Bathroom, Restroom, Kitchen, or Bedroom (Rose Gold)	Price \$29.99
Sold by: Bringing Back Creativity (seller.level1)	
Supplied by: Other	
Condition: New	
1 of: HUILEE Pack of 2 Decorative Velvet Throw Pillow Cover Soft Pillowcase Solid Square Cushion Case for Sofa Bedroom Car 20x20 Inch 50x50 cm Grey	Price \$18.99
Sold by: HUILEE (seller.level1)	
Supplied by: Other	
Condition: New	
1 of: TIMEYARD Macrame Shelf Hanging Shelves, Wood Wall Shelf with Woven Rope, Rustic Floating Shelves Storage Organizer, 3 Tier Shelf Boho Decor for Living Room, Bathroom, Bedroom	Price \$29.99
Sold by: TIMEYARD (seller.level1)	
Supplied by: Other	
Condition: New	
<b>Shipping Address:</b>	
Arlene Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	
<b>Shipping Speed:</b>	
One-Day Shipping	

Shipped on January 12, 2022	
<b>Items Ordered</b>	
2 of: 18 x 18 Inches Pack of 2 Woven Tufted Boho Throw Pillow Cover, Pink Modern Decorative Geometric Cushion with Tassels, Farmhouse Tribal Pillowcase for Couch Sofa Bedroom Living Room, Light Blush	Price \$17.99
Sold by: mspower (seller.level1)	
Supplied by: Other	
Condition: New	
1 of: Wireless Keyboard and Mouse, WisFox Full-Size Wireless Mouse and Keyboard Combo, 2.4GHz Silent USB Wireless Keyboard Mouse Combo for PC Desktops Computer, Laptops, Windows (White)	Price \$26.99
Sold by: SISG-US (seller.level1)	
Supplied by: Other	
Condition: New	
1 of: Edan Throw Pillow Inserts, Set of 2 Lightweight Down Alternative Polyester Pillow, Couch Cushion, Sham Stuffer, Machine Washable. (White, 20x20)	Price \$21.99
Sold by: edan (seller.level1)	
Supplied by: Other	
Condition: New	
1 of: Moon Phase Mirror Set, 5 Piece Scandinavian Natural Decor Moonphase Moon Decor Bohemian Moon Mirror Wall Decoration for Living Room Bedroom, Acrylic Mirror	Price \$25.95
Sold by: Marach (seller.level1)	
Supplied by: Other	
Condition: New	
<b>Shipping Address:</b>	
Arlene Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	
<b>Shipping Speed:</b>	
One-Day Shipping	

Shipped on January 13, 2022	
<b>Items Ordered</b>	
1 of: Pink Abstract Canvas Wall Art For Living Room Large Gold Abstract Painting Water Flow Shape For Bedroom Modern Home Decor Ready to Hang 28x60 inches	Price \$118.54
Sold by: Mispaper Art (seller.level1)	
Supplied by: Other	
Condition: New	
<b>Shipping Address:</b>	
Arlene Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	
<b>Shipping Speed:</b>	
One-Day Shipping	

Shipped on January 14, 2022	
<b>Items Ordered</b>	
1 of: STADENE Soft Faux Fur Rug White Sheepskin Seat Covers Shag Fluffy Area Rug for Bedroom Floor Sofa Living Room(2 x 6ft, White Rug)	Price \$36.99
Sold by: STADENE (seller.level1)	
Supplied by: Other	
Condition: New	
<b>Shipping Address:</b>	
Arlene Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	

Shipped on January 14, 2022	
<b>Items Ordered:</b> 1 of: <a href="#">AKIDMEN Rosegold Mouse Pad 5Pcs Set, 800x400mm PU Leather Desk Pad&amp;Ergonomic Memory Foam Keyboard Wrist Pad&amp;Mouse Wrist Rest for Laptop Office, Including 2 Free PU&amp;Cork Coaster, Pink&amp;Green</a> Sold by: <a href="#">VivoxShare (Seller) (Feedback: 0)</a> Shipped by: Other Condition: New	Price: \$21.99
<b>Shipping Address:</b> Arline Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	
<b>Shipping Speed:</b> One-Day Shipping	

Shipped on January 13, 2022	
<b>Items Ordered:</b> 1 of: <a href="#">AKIDMEN Rosegold Desk Accessory Kit,Set of Stapler, Staple Remover,1000pcs Staples,Tape Dispenser,Big Diamond Ballpoint Pen and 10pcs Binder Clips</a> Sold by: <a href="#">VivoxShare (Seller) (Feedback: 0)</a> Shipped by: Other Condition: New  1 of: <a href="#">Utopia Bedding Throw Pillows Insert (Pack of 2, White) - 18 x 18 Inches Bed and Couch Pillows - Indoor Decorative Pillows</a> Sold by: <a href="#">Utopia Bedding (Seller) (Feedback: 0)</a> Shipped by: Other Condition: New	Price: \$19.99  \$15.99
<b>Shipping Address:</b> Arline Perez 17542 E. 17th St. Suite 105 Tustin, CA 92780 United States	
<b>Shipping Speed:</b> One-Day Shipping	

Payment Information	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132	Item(s) Subtotal: \$401.38 Shipping & Handling: \$0.00 Your Coupon Savings: -\$2.00 Total before tax: \$401.38 Estimated tax to be collected: \$31.09
<b>Billing address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927	
<b>Order Total:</b> \$689.58	

amazon.com

Final Details for Order #113-4416247-3125817  
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Order Placed: September 23, 2021  
Amazon.com order number: 113-4416247-3125817  
Order Total: \$689.58

Shipped on September 24, 2021	
<b>Items Ordered:</b> 2 of: <a href="#">HP 27-Inch FHD Monitor with Built-in Audio (27fw, White)</a> Sold by: <a href="#">Beach Camera Same Day Shipping (Seller) (Feedback: 0)</a> Shipped by: Other Condition: New	Price: \$319.99
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Shipping Speed:</b> Standard Shipping	

Payment Information	
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132	Item(s) Subtotal: \$639.98 Shipping & Handling: \$0.00 Total before tax: \$639.98 Estimated tax to be collected: \$49.60 Grand Total: \$689.58
<b>Billing Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States	
<b>Credit Card Transactions:</b>	Visa ending in 3132: September 24, 2021: \$689.58

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Final Details for Order #114-2641238-2381021 <a href="#">Print this page for your records.</a>		
<b>Order Placed:</b> July 10, 2021 <b>Amazon.com order number:</b> 114-2641238-2381021 <b>Order Total:</b> \$240.43		
<b>Shipped on July 11, 2021</b>		
<b>Items Ordered:</b> 1 of: <a href="#">Amazon GUR31TBKER Retro Compact Refrigerator, 3.1 Cu.Ft Mini Fridge with Dual Doors, Adjustable Mechanical Thermostat with True Freezer, 2 Removable glass shelf, 1 Crystal Crisper, 1 Power Cord, Black</a> Sold by: Amazon.com Services LLC Supplied by: Other Condition: New		
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States		
<b>Shipping Speed:</b> Two-Day Shipping		
<b>Payment information</b>		
<b>Payment Method:</b> Amazon.com Visa Signature   Last digits: 3132 Gift Card		
<b>Billing address</b>		
Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States		
<b>Credit Card transactions</b>		
<small>To view the status of your order, return to <a href="#">Order Summary</a>. Have an issue with your gift card? Read about <a href="#">GIFT CARD ISSUES</a> or contact us.  <small>©2023 Amazon.com, Inc. or its affiliates</small></small>		
<small>Visa ending in 3132: July 11, 2021:\$240.43</small>		
<b>Final Details for Order #114-8840805-8576253 <a href="#">Print this page for your records.</a></b>		
<b>Order Placed:</b> May 24, 2021 <b>Amazon.com order number:</b> 114-8840805-8576253 <b>Order Total:</b> \$327.46		
<b>Shipped on May 25, 2021</b>		
<b>Items Ordered:</b> 3 of: <a href="#">Logitech MX Vertical Wireless Mouse - Advanced Ergonomic Design Reduces Muscle Strain, Control and Move Content Between 3 Windows and Apple Computers (Bluetooth or USB), Rechargeable, Graphite</a> Sold by: Amazon.com Services LLC Supplied by: Other Condition: New		
<b>Partial – Incorrect Cables Provided</b>		
1 of: <a href="#">Rose Gold Desk Organizer for Women Cute Home Office Accessories &amp; Supplies Decor, Girly Desktop Stationery Essentials Organization Set, Mesh Caddy Storage 5 Compartments + 1 Mini Sliding Drawer</a> Sold by: Three Way Cut (seller_id:102)   Product question? <a href="#">Ask Seller</a> Supplied by: Other Condition: New		
1 of: <a href="#">AidFox Memory Foam Keyboard Wrist Rest&amp;Gaming Mouse Wrist Rest, Ergonomic Design for Office, Home Office, Laptop, Desktop Computer, Gaming Keyboard (Black)</a> Sold by: AidFox (seller_id:102)   Product question? <a href="#">Ask Seller</a> Supplied by: Other Condition: New		
1 of: <a href="#">KIDOMEN Rosegold Desk Accessory Kit, Set of Stapler, Staple Remover, 1000pcs Staples, Tape Dispenser, Big Diamond Ballpoint Pen and 10pcs Binder Clips</a> Sold by: KIDOMEN (seller_id:102)   Product question? <a href="#">Ask Seller</a> Supplied by: Other Condition: New		
1 of: <a href="#">Knodel Dual-Sided Desk Mat, Desk Pad, Upgrade Sewing PU Leather Desk Blotter Protector, Mouse Pad, Writing Mat for Office and Home (35.4" x 17", Dark Blue)</a> Sold by: Knodel (seller_id:102)   Product question? <a href="#">Ask Seller</a> Supplied by: Other Condition: New		
1 of: <a href="#">Logitech G502 HERO High Performance Wired Gaming Mouse, HERO 25K Sensor, 25,600 DPI, RGB, Adjustable Weights, 11 Programmable Buttons, On-Board Memory, PC / Mac</a> Sold by: Amazon.com Services LLC Supplied by: Other Condition: New		
5 of: <a href="#">WALI Tempered Glass Monitor Riser Desktop Stand Height Adjustable Table Top for Flat Screen LCD LED TV, Laptop, Notebook, Display (GT701)</a> Sold by: WALI Electronic (seller_id:102)   Product question? <a href="#">Ask Seller</a> Supplied by: Other Condition: New		
<b>Shipping Address:</b> Han Trinh 2128 W CHERRY DR ORANGE, CA 92868-1927 United States		
<b>Shipping Speed:</b> Amazon Day Delivery		

K. P. March

**From:** K. P. March <kmarch@bkylawfirm.com>  
**Sent:** Monday, February 19, 2024 10:10 AM  
**To:** 'Alina Mamlyuk'  
**Cc:** 'Ed Hays'; 'Layla Buchanan'  
**Subject:** RE: LPG Dk. No. 675; Phuong (aka Jayde) Trinh's Administrative Claim

02/19/24

RESPONSE

RE. PHOUNG  
(AKAJAYDE) TRINH  
w/ EXH. A

To Alina Mamlyuk, Esq. of MarshackHays firm, counsel for Trustee Marshack, cc to MarshackHays attys Ed Hays and Layla Buchanan

From KPMarch, Esq. of The Bankruptcy Law Firm, PC, counsel for Han Trinh on Han's Motion for allowance and payment of administrative claim [dkt.674], counsel for Phuong (aka Jayde) Trinh on Jayde's Motion for allowance and payment of administrative claim [dkt.675] and counsel for Greyson Law Center PC on Greyson's Motion [dkt.676]:

Atty Mamlyuk:

This email responds to your 2/14/24 at 10:12am email regarding the Motion for allowance and payment of administrative claim [dkt.675] filed by our law firm, for our firm's client Phoung (aka Jayde) Trinh ("Jayde" hereinafter).

As the California state bar website shows you are a California attorney, my firm is still waiting for you to tell my firm whether you are employed by the MarshackHays law firm. I find it is helpful to be clear about whom my firm is dealing with.

Your 2/14/24 email is in error in saying that Jayde's [dkt.675] Motion does not provide any evidence for how Jayde's administrative claim is calculated. As is the case regarding Han's [dkt.674] Motion, and Han's Declaration thereto, Jayde's [dkt.675] Motion, and Jayde's Declaration thereto, are extremely clear as to how the \$114,825.14 salary that LPG owes Han, for Han's essential 11 weeks of post-petition work for LPG, is calculated, and Jayde's Motion attaches the last Paychex paystub which Jayde received, which proves Jayde's gross pay every 2 week pay period was \$9,615.39, which is \$4,807.70 per week, which is \$250,000 per year.

But let me recap that calculation for you: See ¶8 of Jayde's Declaration, and see Paychex paystub that is Exhibit A to Jayde's Declaration. The Paychex paystub states that Han was being paid gross earnings of \$9,615.39 per 2 week pay period (see top right box on Exhibit A). That is gross pay of \$4,807.70 per week. Jayde's Declaration ¶¶7, 8, and 11, attest Han did 11 weeks of essential work for LPG, post-petition, from 3/20/23 to 6/2/23, totaling \$52,884.67 salary for that 11 weeks. Math is \$4,807.70 per week x 11 weeks = \$52,884.64 salary that LPG owes Jayde for Jayde's 11 weeks of postpetition work for LPG, which is an administrative claim per 11 USC §503(b)(1)(A). The \$52,884.64 figure is stated at ¶8 of Jayde's Declaration.

In addition, as Jayde's administrative claim Motion explains, and as Jayde's Declaration (¶20 explains), Jayde is entitled, per CA Labor Code §203(a), to be paid penalties for late Pay totaling \$28,846.15 in late pay penalties.

In addition, as Jayde's administrative claim Motion explains, and as Jayde's Declaration ¶21 explains, Jayde is entitled, per CA Labor Code § 227.3, to be paid for 258.72 hours of vacation time Jayde had accrued, but had not taken, as of 6/2/23. That vacation pay totals \$31,094.354, and is calculated correctly in Jayde's Dkt.675 claim, and in Jayde's Declaration (¶21).

You ask for evidence (in addition to Jayde's Declaration, and Han Trinh's Declaration) that Han and Jayde were accruing vacation pay while employed at LPG.

As I told you in my email to you of 2/14/24, Han has searched, and now been able to locate two earlier Paychex pay stubs, one for each of Han and Jayde, which I am attaching as Exhibit A hereto, and which show that Han and Jayde were each accruing vacation pay while employed at LPG, at the rate of 6.16 hours of vacation time, for each 2 week pay period. I believe that is the statutory rate of accrual, for a business in Tustin, Ca, where LPG was located. Jayde's Declaration (¶21), and Han's Declaration (¶23) attest that Han and Jayde were each accruing vacation hours at the rate of 6.16 hours of vacation time, for each 2 week pay period. The 2 paychex paystubs that I am attaching as Exhibit A, show this, and were also attached as Exhibit A to the email my firm sent you yesterday, 2/14/24, responding to your 2/12/24 at 7:46pm email asking questions about Han Trinh's [dkt674] Motion for allowance and payment of administrative claim.

I note that Paychex was LPG's payroll processing company, and therefore, that Trustee Marshack can ask Paychex to supply Trustee Marshack with all the Paychex paystubs, for Han and Jayde Trinh, for the several years each was employed by LPG. Please do so, and please send my firm copies of all those paystubs. Thx in advance.

Jayde's [dkt.675] Motion, pp. 11-12, adds up the \$52,884.64 + \$28,846.15 + \$31,094.35 = \$114,852.14 total for postpetition salary, late pay penalties and payment for accrued vacation not taken.

As regards to your email requesting my firm to provide you/MarshackHays, with a copy of Jayde's employment contract with LPG, Jayde does not have a copy, but LPG has a copy of Jayde's employment contract, fully signed by Jayde and LPG. LPG also has a copy of Han Trinh's employment contract, fully signed by Jayde-and LPG.

LPG's contract with Jayde Trinh included that LPG would pay Jayde Trinh's student loans, before those student loans came due, as part of Jayde's compensation, in addition to paying Jayde a weekly salary. LPG paid \$40,000 - \$45,000 to Jayde's student loan lender Great Lakes Borrower Services, toward paying Jayde's total student loan debt, which LPG paid on or about June 23, 2022

LPG paid the remainder of Jayde's student loan debt of \$163,497.20, which LPG paid to Jayde's student loan lender (Great Lakes Borrower Services), on or about February 2, 2023, which was before Jayde Trinh's student loans came due, as required by LPG's written employment contract with Jayde. The due date of Jayde's student loans (and of millions other student loans) had been repeatedly extended, due to the pandemic/nationwide student loan payment moratorium, LPG paid off Jayde's student loans, before those loans came due. Jayde's [dkt.675] Motion does not make any claim regarding the student loan debt, because LPG paid Jayde's student loan debt, per contract, before LPG filed bankruptcy. Paying an employee's law school tuition, or paying an employee's student loans, is a fairly common part of compensation.

LPG contracting to pay, and paying Jayde's student loan debt, as a part of Jayde's compensation as an attorney employed by LPG was not a fraudulent transfer, because Jayde performed legal work for LPG, constituting reasonably equivalent value for that payment. Nor did LPG's paying Jayde's student loan debt constitute a preference, because a preference is a payment paying an antecedent debt, and LPG contracted to pay, and did pay, Jayde's student loan debt, before Jayde's student loan debt came due. LPG paying Jayde's student loan debt, before that debt came due, is not payment on an antecedent debt, and so is not a preference, as a matter of law.

As was the case with Han, Jayde and LPG signed Jayde's written contract when Jayde was first hired by LPG, and each time Jayde got a raise thereafter, Jayde signed a sheet for the LPG HR department, verifying the specific raise. My firm understands that was the procedure for all LPG employees, when they received raises.

Judge Clarkson continued the hearing on all the administrative claim motions so that the parties could exchange discovery. Therefore, please email my firm the following items relevant to Jayde Trinh's [dkt.675] Motion for allowance and payment of administrative claim, similar to what my firm requested in my firm's 2/14/24 email to your firm regarding Han Trinh's [dkt.674] Motion:

1. LPG's copy of Jayde's employment contract, signed by Jayde and by LPG. Also, please email my firm each sheet Jayde signed for LPG's HR department, when Jayde received a raise from LPG, verifying the amount of Jayde's new salary.
2. Please also please email my firm LPG's copy of Han Trinh's employment contract, signed by Han and by LPG. Han signed a sheet for LPG's HR department, verifying Han's new salary, each time Han got a raise from LPG. Please email my firm all those receipts.
3. LPG kept an employee file on each LPG employee. Please email my firm the full employee file which LPG kept on Jayde, and the full employee file which LPG kept on Han.
4. All paychex paystubs for Han and Jayde Trinh, for all the years they were employed by LPG; and
5. LPG's W-2 forms for 2023 year for each of Han and Jayde Trinh.

Thanks in advance for emailing my firm 1, 2, 3, 4 and 5.

At the time that Han Trinh, and Jayde Trinh, performed the 11 weeks of post-petition work for LPG, they were the only LPG employees who were doing the work they did for LPG, and who could continue doing that work for LPG. Their work was essential (as Jayde's Declaration ¶11 and 12, and Han's Declaration ¶11 and 12) explains, because Han and Jayde were the only LPG employees administering LPG's 28,000 active litigation files. Those 28,000 active litigation files could not be managed, without Han and Jayde's work.

As regards your question about why Jayde's salary was increased over the years, LPG increased Jayde's salary, as Jayde's duties at LPG increased, just as LPG increased Han's salary, as Han's duties increased. Jayde's salary at the time she was first hired at LPG was \$120,000 (low for a California attorney), which was later raised to \$150,000 then to \$180,000, then to \$216,000 and then to \$250,000 per year. \$250,000 per year salary is what is shown on Paychex paystub that is Exhibit A to Jayde's [dkt.675] administrative claim motion). The increase of Jayde's salary to \$250,000 per year was because by then, Han and Jayde, together, were administering the whole LPG attorney network.

A little further information regarding what LPG paid Han Trinh, to supplement my firm's email of yesterday about Han: Han started working for LPG for \$17.31 per hour, but Han worked so much overtime, that LPG soon changed Han's salary to \$110,000 per year salary. Later Han's salary was increased to \$120,000 per year, because Han was given more responsibilities when a LPG attorney quit; then was increased to \$140,000 per year when Han was given one small department to run; then was increased to \$180,000 per year when Han was given three departments to run, then was increased to \$300,000 per year, when Han was promoted to head administrator for all of LPG.

As I told you in my firm's email to you of 2/14/24, Han was not paid more than Jayde, because a part of Jayde's compensation was that LPG contracted to repay Jayde's student loans from law school, before those loans came due, which LPG did pay before those loans came due. When LPG's repaying Jayde's student loans from law school is taken into account, Jayde was paid more than Han.

However, as the Paychex paystubs that are Exhibit A to each of Han Trinh's, and Jayde Trinh's administrative claim motions, show clearly Han and Jayde's W-2 salaries, and as those are issued by LPG's payroll processing company, Paychex, there is no legal basis for Trustee Marshack, or your attorney Mamlyuk, or the MarshackHays firm, to object to (aka second guess) those salary amounts.

Please REPLY to confirm receipt.

Please email my firm 1, 2, 3, 4 and 5.

I trust this email answers your questions regarding Jayde Trinh's [dkt.675] Motion for allowance and payment of administrative claim, --similar to my firm's 2/14/24 email to you answering your questions regarding Han Trinh's dkt.674 Motion for allowance and payment of administrative claim; and that MarshackHays will now file a short pleading with the Bankruptcy Court, stating that MarshackHays has examined Han and Jayde Trinh's Motions [dkt.674 and dkt.675 respectively] for allowance and payment of administrative claims, and agrees those Motions should be granted as filed. My firm requests MarshackHays to promptly do so, because there is no valid reason to oppose Han's or Jayde's administrative claim motions. Please REPLY to confirm MarshackHays will now do that, promptly. Thank you in advance.

KPMarch

Kathleen P. March, Esq.  
The Bankruptcy Law Firm, PC  
10524 W. Pico Blvd, Suite 212  
Los Angeles, CA 90064  
Phone: 310-559-9224  
Fax: 310-559-9133  
E-mail: [kmarch@BKYLAWFIRM.com](mailto:kmarch@BKYLAWFIRM.com)  
Website: [www.BKYLAWFIRM.com](http://www.BKYLAWFIRM.com)

"Have a former bankruptcy judge for your personal bankruptcy attorney"

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**From:** Alina Mamlyuk <[amamlyuk@marshackhays.com](mailto:amamlyuk@marshackhays.com)>  
**Sent:** Wednesday, February 14, 2024 10:12 AM  
**To:** [kmarch@BKYLAWFIRM.com](mailto:kmarch@BKYLAWFIRM.com)  
**Cc:** Ed Hays <[EHays@MarshackHays.com](mailto:EHays@MarshackHays.com)>; Layla Buchanan <[LBuchanan@marshackhays.com](mailto:LBuchanan@marshackhays.com)>  
**Subject:** RE: LPG Dk. No. 675; Phuong (aka Jayde) Trinh's Administrative Claim

Good morning, Ms. March—

I emailed you yesterday regarding LPG Dk. No. 674, Han Trinh's administrative claim. In investigating and verifying the three administrative claims in which you are counsel to the three claimants (Dk. Nos. 674, 675, 676 filed in In re: Litigation Practice Group, P.C., Case No. 8:23-bk-10571-SC), I would prefer to keep them distinct and separate from each other for clarity. I will keep the communication threads separate, although they may be asking for similar or even identical documentation.

Your client, Phuong (aka Jayde) Trinh ("Jayde"), filed an administrative claim as Dk. No. 675 ("Jayde Admin Claim" / "Motion") in the amount of \$114,825.14 and I am following up with you regarding some questions we have and documents we need to begin verifying the claim.

Other than a copy of a paystub for a single check #13034, the Motion did not provide any evidence for your calculation of Jayde's admin claim. Can you please provide a copy of an employment agreement that states Jayde's duties, her salary, her vacation vesting schedule and the basis for her more than double salary increase from \$120,000 to

Case 8:23-bk-10571-SC Doc 945 Filed 02/19/24 Entered 02/19/24 11:36:07 Desc  
\$250,000/yr (Motion, pgs 5-6)? Check #13034 was cut to Jayde on the eve of LPG's filing its bankruptcy petition, so  
please forward any evidence that shows when Jayde began getting paid at the rate of \$9,615.39 bi-weekly. Jayde's  
declaration attached to Dk. No. 822, states that "Han and I work for a living. We are young and are not financially well  
off," which appears to indicate that Jayde's doubling of the salary was recent. For how many periods did Jayde receive  
paychecks comparable to check #13034 attached to Jayde's admin claim motion?

Likewise, there is no evidence outside of Jayde's declaration regarding the vested vacation portion of Jayde's claim  
(\$31,094.35)—the paycheck stub has no vacation time indicated at all. Please forward any employment agreement that  
states how 224.83 hours were vested.

Please forward a copy of LPG's agreement to pay Jayde's student loans off, (Motion, pg 15, lines 15-21) as well as any  
documents showing how and when these payments were made, as well as the cumulative total that LPG paid Jayde for  
her student loans. What did LPG receive in return for paying Jayde's student loans? With whom did Jayde negotiate this  
particular employment benefit?

Looking forward to working together and getting some clarity in resolving this claim.

Thank you,

Alina Mamlyuk

LITIGATION PRACTICE GROUP PC  
17542 17th St Ste 100  
Tustin CA 92780

1607-7926  
LOC:LPG Law CA  
EE ID: 1031 DD

Payroll by Paynexus, Inc.

Payroll by Paynexus, Inc.

HAN TRINH

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS				
Han Trinh		BASIS OF DESCRIPTION				
██████████		PAY				
Soc Sec #: xxx-xx-xxxx Employee ID: 1031		Salary				
Home Department: 1 LPG CA		Holiday				
Pay Period: 01/30/23 to 02/12/23		Total Hours				
Check Date: 02/17/23 Check #: 12689		Gross Earnings				
NET PAY ALLOCATIONS		Total Hrs Worked				
DESCRIPTION THIS PERIOD (\$) YTD (\$)		Dir Dep Reimb				
Check Amount 0.00 0.00		REIMB & OTHER PAYMENTS				
Chkg 860 5297.85 21491.38		WITHHOLDINGS				
NET PAY 5297.85 21491.38		DESCRIPTION				
TIME OFF (Based on Policy Year)		FILING STATUS				
DESCRIPTION BEGBAL CURRACBL CURRDEDCT AVALBAL		THIS PERIOD (\$)				
Sick 40.00 hrs 0.00 hrs 0.00 hrs 40.00 hrs		TOTAL				
DESCRIPTION BEGBAL CURRACBL CURRDEDCT AVALBAL		3533.51				
Vacation 194.04 hrs 6.16 hrs 0.00 hrs 200.20 hrs		DEDUCTION				
		DESCRIPTION				
		THIS PERIOD (\$)				
		YTD (\$)				
		401k EE Pretax				
		Medical Pre-tax				
		TOTAL				
		2707.11				
		NET PAY				
		THIS PERIOD (\$)				
		5297.85				
		YTD (\$)				
		21491.38				

Payroll by Paynexus, Inc.

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LITIGATION PRACTICE GROUP PC  
17542 17th St Ste 100  
Tustin CA 92780

1607-7926  
LOC:LPG Law CA  
EE ID: 1032 DD

Payroll by Paychex, Inc.  
NON-NEGOTIABLE

PHUONG TRINH  
[REDACTED]

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION		EARNINGS			
		BASIS OF DESCRIPTION		HRS/UNITS	RATE THIS PERIOD (\$)
Phuong Trinh [REDACTED]		PAY			YTD (\$)
Soc Sec #: xxx-xx-xxxx Employee ID: 1032		Salary		9615.39	38461.56
Home Department: 1 LPG CA		Total Hours		9615.39	38461.56
Pay Period: 01/30/23 to 02/12/23		Gross Earnings			
Check Date: 02/17/23 Check #: 12690		Total Hrs Worked			
NET PAY ALLOCATIONS		Dir Dep Reimb			500.00
DESCRIPTION THIS PERIOD (\$)		REIMB & OTHER PAYMENTS			500.00
Check Amount 0.00		WITHHOLDINGS			
Chkg 643 6224.28		DESCRIPTION		THIS PERIOD (\$)	YTD (\$)
NET PAY 6224.28		FILING STATUS			
TIME OFF (Based on Policy Year)		TOTAL		2556.14	10224.57
DESCRIPTION BEGBAL CURRACBL CURRDEDCT AVALBAL		DEDUCTION			
Sick 40.00 hrs 0.00 hrs 0.00 hrs 40.00 hrs		DESCRIPTION		THIS PERIOD (\$)	YTD (\$)
DESCRIPTION BEGBAL CURRACBL CURRDEDCT AVALBAL		401k EE Pretax		750.00	3000.00
Vacation 206.35 hrs 6.16 hrs 0.00 hrs 212.51 hrs		Medical Pre-tax		80.05	320.20
		PostTx EE health		4.92	19.68
		TOTAL		834.97	3339.88
		NET PAY		THIS PERIOD (\$)	YTD (\$)
		6224.28		25397.11	

Payroll by Paychex, Inc.

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10524 W. Pico Blvd., Ste. 212, Los Angeles, CA 90064

A true and correct copy of the foregoing document entitled (specify):

**UNILATERAL STATUS REPORT OF GREYSON LAW CENTER PC, HAN TRINH AND PHOUNG (AKA JAYDE) TRINH  
FOR 2/29/24 AT 11AM STATUS CONFERENCE ON ADMINISTRATIVE CLAIM MOTIONS; DECL.KATHLEEN P.  
MARCH ,ESQ, ATTACHING 3 REPONSES SENT TO MARSHACK HAYS LAW FIRM**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 2/19/24, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See next page

Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

n/a

Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 2/19/24, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Scott Clarkson  
United States Bankruptcy Court  
Central District of California  
411 West Fourth Street, Suite 5130  
Santa Ana, CA 92701-4593

And email service of Alina Mamlyuk Esq of MarshackHays firm to  
amamlyuk@marshackhays.com

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/19/24  
Date

Kathleen P. March  
Printed Name

/s/ Kathleen P. March  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**:

- Keith Barnett keith.barnett@troutman.com, kelley.wade@troutman.com
- Eric Bensamochan eric@eblawfirm.us, G63723@notify.cincompass.com
- Christopher Celentino christopher.celentino@dinsmore.com, caron.burke@dinsmore.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- Michael T Delaney mdelaney@bakerlaw.com, TBreeden@bakerlaw.com
- Jeremy Freedman jeremy.freeman@dinsmore.com, nicolette.murphy@dinsmore.com
- Christopher Ghio christopher.ghio@dinsmore.com,  
nicolette.murphy@dinsmore.com;angelica.urena@dinsmore.com;deamira.romo@dinsmore.com
- Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- Richard H Golubow rgolubow@wghlawyers.com,  
jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- Sweeney Kelly kelly@ksgklaw.com
- Meredith King mking@fsl.law, ssanchez@fsl.law;jwilson@fsl.law
- David S Kupetz David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
- Matthew A Lesnick matt@lesnickprince.com, matt@ecf.inforuptcy.com;jmack@lesnickprince.com
- Daniel A Lev daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com
- Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com
- Daniel S March marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
- Kathleen P March kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net
- Richard A Marshack (TR) pkraus@marshackhays.com,  
rmarshal@iq7technology.com;ecf.alert+Marshack@titlexi.com
- Kenneth Misken Kenneth.M.Misken@usdoj.gov
- Queenie K Ng queenie.k.ng@usdoj.gov
- Lisa Patel lpatel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
- Douglas A Plazak dplazak@rhlaw.com
- Daniel H Reiss dhr@lnbyg.com, dhr@ecf.inforuptcy.com
- Ronald N Richards ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- Jonathan Serrano jonathan.serrano@dinsmore.com
- Zev Shechtman zs@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com
- Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
- Andrew Still astill@swlaw.com, kcollins@swlaw.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- William J Wall wwall@wall-law.com
- Johnny White JWhite@wrslawyers.com, jlee@wrslawyers.com